

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
SPRING VALLEY BRANCH; JULIO
CLERVEAUX; CHEVON DOS REIS; ERIC
GOODWIN; JOSE VITELIO GREGORIO;
DOROTHY MILLER; HILLARY MOREAU;
and WASHINGTON SANCHEZ,

Plaintiffs,

v.

EAST RAMAPO CENTRAL SCHOOL
DISTRICT and MARYELLEN ELIA, IN
HER CAPACITY AS THE
COMMISSIONER OF EDUCATION OF
THE STATE OF NEW YORK,

Defendants.

17 Civ. 8943 (CS) (JCM)

**DECLARATION OF CLAUDIA T. SALOMON IN SUPPORT OF PLAINTIFFS’
OPPOSITION TO THE BOARD MEMBERS’ MOTION FOR RECONSIDERATION**

CLAUDIA T. SALOMON, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury
as follows:

1. I am a Partner at the law firm of Latham & Watkins LLP, 885 Third Avenue, New
York, NY 10022, co-counsel for Plaintiffs with the New York Civil Liberties Union Foundation
in the above-captioned matter. I am a member in good standing of the bar of the State of New York
and this Court.

2. I respectfully submit this declaration in support of Plaintiffs’ Opposition to the
Board Members’ Motion for Reconsideration. I am familiar with all of the facts and circumstances
set forth herein.

3. Attached as Exhibit 1 is a true and correct copy of excerpts of the transcript of the deposition of Pierre Germain held on October 18, 2018.

4. Attached as Exhibit 2 is a true and correct copy of excerpts of the transcript of the deposition of Bernard Charles Jr. held on October 15, 2018.

5. Attached as Exhibit 3 is a true and correct copy of excerpts of the document bearing Bates number ERCSD_BoE_00000765.

6. Attached as Exhibit 4 is a true and correct copy of the document bearing Bates number ERCSD_GROSSMAN_00000490.

7. Attached as Exhibit 5 is a true and correct copy of the document bearing Bates number ERCSD00017469.

8. Attached as Exhibit 6 is a true and correct copy of the document bearing Bates number ERCSD_ROTHMAN_00000035.

9. Attached as Exhibit 7 is a true and correct copy of excerpts of the document bearing Bates number ERCSD_GROSSMAN_00000742.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, NY
November 9, 2018

A handwritten signature in dark ink, appearing to read 'Claudia T. Salomon', with a long horizontal flourish extending to the right.

Claudia T. Salomon